

# Department of Energy

Ohio Field Office Fernald Closure Project 175 Tri-County Parkway Springdale, Ohio 45246 (513) 648-3155



APR 6 2006

Mr. Paul Pardi, RCRA Group Leader and FFCA Project Manager Ohio Environmental Protection Agency 401 East 5th Street Dayton, Ohio 45402-2911

Dear Mr. Pardi:

DOE-0107-06

SUBMITTAL OF CROSS-REFERENCE INDEX PURSUANT TO THE DIRECTOR'S FINAL FINDINGS AND ORDERS FILED JUNE 6, 1996 - DRAFT CERTIFICATION, REPORT FOR AREA 6 FORMER PRODUCTION AREA AND MAIN DRAINAGE CORRIDOR AREA

Reference:

Letter and Director's Final Findings and Orders (DF&O), Thomas E. Crepeau, Ohio EPA to Phil Hamric, U. S. DOE and John Bradburne, FERMCO, dated June 6, 1996.

In accordance with Section V, Order #2 of the Director's Final Findings and Orders (Reference 1), attached is a cross-reference index of Hazardous Waste Management Unit (HWMU) closure components and CERCLA documents for those HWMUs identified in Attachment A of the DF&O. The index links specific components of Ohio Environmental Protection Agency's (OEPA) Closure Plan Review Guidance for RCRA Facilities related to substantive closure requirements with the appropriate CERCLA document which addresses those components. The list is cumulative and provides page numbers and sections for those CERCLA documents that have already been submitted.

Section V of the DF&O requires the Fernald Closure Project to provide an updated copy of the cross-reference table following the submittal of a referenced CERCLA document. The <u>Draft Certification Report for Area 6 Former Production Area and Main Drainage Corridor Area</u> was submitted to Ohio and U.S. EPA on March 31, 2006. The specific reference to this document in the cross-reference table has been highlighted.

Mr. James A. Saric Mr. Tom Schneider -2-

DOE-0107-06

If you have any questions or require additional information, please contact Ed Skintik at (513) 246-1369 or me at (513) 648-3139.

Sincerely,

Johnny W. Reising

Director

cc:

w/enclosure

F. Johnston

F. Miller

E. Skintik, DOE-FCP

**AR** Coordinator

RCRA Operating Record

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| Description/Detailed Drawing of Waste     Management Unit(s) to be Closed (Closure     Guidance Item 3.2 and 3.4) | OU1 FINAL Remedial Investigation Report, August1994                         | Waste Pit 4 (27):     Description, pp. 1-23 to 1-24; History, pp. 1-35 to 1-36;     Drawings, pp. 1-83, 1-88  Waste Pit 5 (42):     Description, p. 1-24 to 1-27; History, pp. 1-36 to 1-37;     Drawings, pp. 1-83, 1-89  |
|   | OU3 FINAL Integrated Remedial Design/Remedial Action Work<br>Plan, May 1997 | HWMU Component Number and Associated D&D complex:<br>Table 3-10, p. 3-71   |
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|   | FINAL Thorium/Plant 9 Complex Implementation Plan, August<br>1997           | Plant 9 Warehouse - Bldg. 81 (35):<br>Figure D-10, D-11  |
|   | FINAL Misc. Small Structures Implementation Plan, October<br>1998           | Waste Oil Decant Shelter (component of Trane Incinerator ) (28): No drawing available for this unit  |
|   |   | KC-2 Warehouse – Bldg. 63 (34):<br>Figure D-22, D-23   |
|   |   | UNH Tanks – NFS Storage Area (46):<br>Figure D-1   |
|   | FINAL Implementation Document for HWMUs #28 and #50,<br>December 1998       | Trane Incinerator (28): Attachment 1   |
|   |   | UNH Tanks – Raffinate Bldg. (50):<br>Attachment 2  |
|   | FINAL Plant 6/East Warehouse Complex Implementation Plan,<br>July 1999      | Plant 6 Warehouse – Bldg. 79 (37): Appendix D  |
|   | FINAL Multi-Complex Implementation Plan, October 2001                       | NAR System (10), Box Furnace (14), Oxidation Furnace #1 (15), Plant 8 Warehouse - Building 80 (29), UNH Tanks - North of Plant 2 (47), UNH Tanks - Southeast of Plant 2 (48), UNH Tanks - Digestion Area (49):  Appendix D |
|   | FINAL Laboratory Complex Implementation Plan, April 2002                    | Pilot Plant Warehouse - Bldg. 68 (33):<br>Appendix D   |

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|   | OU3 FINAL Remedial Investigation/Feasibility Study Report, February 1996   | Waste Managed in HWMU: Table K-1  |
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|   | FINAL Implementation Plan for Area 3A/4A, May 2001   | Storage Pad North of Plant 6 (36):<br>Section 2.3.2.3, Location of HWMUs and USTs, p. 2-12   |
|   | FINAL Implementation Plan for Area 6 - Solid Waste Landfill and Fire Training Facility, March 2003 | Fire Training Facility (1): Section 3.5, Identification of Area-Specific Constituents of Concern, pp. 3-9 to 3-10; Table 3-1, Preliminary Area-Specific Constituents of Concern  |
|   | FINAL Implementation Plan for Area 3B/4B/5, February 2004  | Drum Storage Area Near Lab Loading Dock (4), Drum<br>Storage Area South of W-26 (5), Tank Farm Sump (11),<br>Plant 8 East Pad (17), Plant 8 West Pad (18), Plant 1<br>Storage Pad (20), Abandoned Sump West of Pilot Plant (22):<br>Table 2-4, p. 2-31 |
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|   | OU3 FINAL Integrated Remedial Design/Remedial Action Work Plan, May 1997                           | General Methods for Removing and Storing Waste: HWMU Decontamination, Section 3.2.3, p. 3-13; Materials Management, Section 3.3, pp. 3-30 to 3-63; HWMU Remediation (use of Safe Shutdown, D&D of complexes), Section 3.5.3, pp. 3-69 to 3-73          |

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|   | OU5 FINAL Sitewide Excavation Plan, July 1998  | Excavation, Loading, Staging, Storage, Treatment and/or Disposition of Impacted Material: Section 2.0, Remediation Issues and General Strategies; Section 3.0, General Implementation Approach; Section 4.0, Location Specific Excavation Approaches; Appendix B, Sitewide Sequencing Plan; Appendix F.3 to F.5, Implementation of Construction; Appendix I, Sitewide Excavation of Contamination by Constituent |
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|   | FINAL Implementation Plan for Area 3A/4A, May 2001   | Storage Pad North of Plant 6 (36): Section 3.2.2, Concrete, Asphalt Pads, Roadways and Floors, pp. 3-9 to 3-10; Section 3.3.3, HWMUs and USTs, p. 3-17; Section 3.3.4, General Excavation, pp. 3-17 to 3-19  |
|   | FINAL Implementation Plan for Area 6 - Solid Waste Landfill and Fire Training Facility, March 2003 | Fire Training Facility (1):  Section 4.2, At- and Below-Grade Structure Demolition, pp. 4-5 to 4-6; Section 4.3, Soil Excavation, Monitoring and Segregation, pp. 4-6 to 4-10; Section 4.4, Impacted Material Management, pp. 4-10 to 4-12   |
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|   | FINAL Thorium/Plant 9 Complex Implementation Plan, August<br>1997             | Plant 9 Warehouse – Bldg. 81 (35)<br>Figure 4-1, p. 43   |
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|   | FINAL Laboratory Complex<br>Implementation Plan, April 2002                   | Pilot Plant Warehouse - Bldg. 68 (33):<br>Section 4.0, p. 41   |

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|  | OU5 FINAL Sitewide Excavation Plan, July 1998  | Health and Safety Plan: Section 6.0, Project Health and Safety; Table 6-1, Occupational Monitoring and Action Levels  |
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|  | FINAL Implementation Plan for Area 3A/4A, May 2001   | Storage Pad North of Plant 6 (36): Section 5.0, Project Specific Health and Safety  |
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|   | OU5 Integrated Remedial Design Packages for Individual<br>Remediation Areas | Area/Phase-Specific Requirements for Decontamination of Excavation Equipment:  |
|   | Area 1, Phase II Supplemental Characterization Package, April 1999          | Sludge Drying Beds (41): Equipment Decontamination: Section 5.2, Loading and Hauling, pp. 5-2 to 5-3   |
|   | Area 1, Phase II Integrated Remedial Design Package,<br>September 1998      | Sludge Drying Beds (41):  Remediation-Generated Water Management: Section 3.4.4, Remediation-Generated Wastewater Management, pp. 3-33 to 3-35 |
|   | FINAL Implementation Plan for Area 3A/4A, May 2001                          | Storage Pad North of Plant 6 (36):  Appendix A, Section 5.6, Equipment and Personnel  Monitoring Decontamination, pp. 13 to 14                 |

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| 6. Decontamination Efforts (Closure Guidance Item 3.10) - Continued   | FINAL Implementation Plan for Area 6 - Solid Waste Landfill and Fire Training Facility, March 2003 | Fire Training Facility (1):<br>Section 4.1.4, Support Facilities, pp. 4-2 to 4-3  |
|   | FINAL Implementation Plan for Area 3B/4B/5, February 2004  | Drum Storage Area Near Lab Loading Dock (4), Drum Storage Area South of W-26 (5), Tank Farm Sump (11), Plant 8 East Pad (17), Plant 8 West Pad (18), Plant 1 Storage Pad (20), Abandoned Sump West of Pilot Plant (22): Section 3.4.3.5, Haul Routes, p. 3-15; Appendix A, Section 5.7, Equipment and Personnel Monitoring Decontamination, p. 14 |
|   | FINAL Excavation Plan for Area 6 Waste Pits and General<br>Area, October 2005                      | Waste Pit 4 (27), Waste Pit 5 (42): Section 3.4.1, Above-WAC Excavations, p. 3-6; Section 3.3.5, Site Storm Water Treatment Capacity, pp. 3-4 to 3-5  |
| 7. Remediation Standards for Soils and Groundwater <sup>2</sup> (Closure Guidance Items 3.11, 3.11.1, 3.11.2, and 3.13) | OU1 FINAL Record of Decision, January 1995   | Waste Pit (27, 42) Area: pp. 9-1 to 9-11 Tables B-5 to B-16   |
|   | OU1 Remedial Design Pre-Final Design Package II, March 1996  | Waste Pit (27, 42) Area: pp. A-3 to A-7   |
|   | OU5 FINAL Record of Decision, January 1996   | Final Remediation Levels (FRLs) for Soil and Groundwater:<br>Table 9-3, p. 9-23<br>Table 9-4, p. 9-26   |
|   | OU5 FINAL Sitewide Excavation Plan, July 1998  | Summary of Contaminant Levels Pertinent to Soil Remediation at the FCP: Table 1-4; Final Remediation Levels: Section 2.1.3, p. 2-10; Constituents of Ecological Concern: Section 2.1.4, p. 2-13; Preliminary Identification of Primary, Secondary COCs and Ecological COCs Assigned to Remediation Areas: Table 2-7                               |
|   | OU5 Integrated Remedial Design Packages for Individual<br>Remediation Areas                        | Area/Phase-Specific FRLs:   |
|   | Area 1, Phase II Supplemental Characterization Package, April 1999                                 | Sludge Drying Beds (41): Section 3.3, Material Disposition Sampling Plan, pp. 3-3 to 3-4; Section 5.1, Excavation and Monitoring, pp. 5-1 to 5-2  |
|   | FINAL Implementation Plan for Area 3A/4A, May 2001   | Storage Pad North of Plant 6 (36): Soil Final Remediation Levels for HWMUs and USTs, Table 2-6  |
|   | FINAL Implementation Plan for Area 6 - Solid Waste Landfill and Fire Training Facility, March 2003 | Fire Training Facility (1): Soil Final Remediation Levels, Table 3-3  |
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| 7. Remediation Standards for Soils and Groundwater <sup>2</sup> (Closure Guidance Items 3.11, 3.11.1, 3.11.2, and 3.13) - Continued                                     | FINAL Implementation Plan for Area 3B/4B/5, February 2004  | Drum Storage Area Near Lab Loading Dock (4), Drum Storage Area South of W-26 (5), Tank Farm Sump (11), Plant 8 East Pad (17), Plant 8 West Pad (18), Plant 1 Storage Pad (20), Abandoned Sump West of Pilot Plant (22): Soil Final Remediation Levels, Table 2-3   |
|   | FINAL Excavation Plan for Area 6 Waste Pits and General<br>Area, October 2005                      | Waste Pit 4 (27), Waste Pit 5 (42):<br>Table 2-3, p. 2-17  |
| Sampling Plan and Analytical Procedures (Closure Guidance Item 3.14) – Includes Sampling to Define the Extent of Contamination and Sampling to Verify the Unit is Clean | OU1 FINAL Remedial Investigation Report, August 1994   | Procedures for Determining Nature and Extent of Contamination at Waste Pit Area:  Waste Pit 4 (27), Waste Pit 5 (42): Chapter 2, pp. 2-1 to 2-161  |
|   | OU1 FINAL Remedial Action Documents Package, April 1999  | Procedures for Sampling and Analysis of Waste Pit Area;<br>Certification of Waste Pit Area Cleanup:<br>Sampling and Analysis Plan  |
|   | OU5 FINAL Remedial Investigation Report, March 1995  | Procedures for Determining Nature and Extent of Soil<br>Contamination:<br>Chapter 2, pp. 2-1 to 2-83   |
|   | OU5 FINAL Sitewide Excavation Plan, July 1998  | Procedures for Certifying Attainment of Soil Cleanup: Section 2.2.2, p. 2-18 to 2-19; Section 2.2.5, p. 2-22 to 2- 23; Section 3.4, p.3-22 to 3-23; Appendix G, Certification Design Rationale   |
|   | OU5 Integrated Remedial Design Packages (IRDPs) for Individual Remediation Areas                   | Area/Phase-Specific Procedures for Certifying FRL Attainment:  |
|   | Area 1, Phase II Supplemental Characterization Package,<br>August 1998                             | Sludge Drying Beds (41): Section 3.3, Material Disposition Sampling Plan, p. 3-3; Section 5.0, Excavation Monitoring, pp. 5-1 to 5-2   |
|   | FINAL Implementation Plan for Area 3A/4A, May 2001   | Storage Pad North of Plant 6 (36): Section 2.3.2.3, Location of HWMUs and USTs, p. 2-12; Section 3.3.3, HWMUs and USTs, p. 3-17; Section 3.3.4, General Excavation, pp. 3-17 to 3-19   |
|   | FINAL Implementation Plan for Area 6 - Solid Waste Landfill and Fire Training Facility, March 2003 | Fire Training Facility (1): Section 3.6, Excavation Boundaries, p. 3-10; Section 4:6, Precertification and Interim Grading, p. 4-13  |
|   | FINAL Implementation Plan for Area 3B/4B/5, February 2004  | Drum Storage Area Near Lab Loading Dock (4), Drum Storage Area South of W-26 (5), Tank Farm Sump (11), Plant 8 East Pad (17), Plant 8 West Pad (18), Plant 1 Storage Pad (20), Abandoned Sump West of Pilot Plant (22): Section 2.6, Excavation Boundaries, pp. 2-20 to 2-27; Section 3.9, Precertification And Interim Grading, p. 3-31 |

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| 8. Sampling Plan and Analytical Procedures (Closure Guidance Item 3.14) – Includes Sampling to Define the Extent of Contamination and Sampling to Verify the Unit is Clean - Continued | FINAL Excavation Plan for Area 6 Waste Pits and General Area,<br>October 2005   | Waste Pit 4 (27), Waste Pit 5 (42): Section 2.0, Predesign Investigations and Characterization Data; Section 3.8, Precertification,  |
| verify the Onit is Clean - Continued   | OU5 Certification Design Letters for Individual Remediation Areas   | p. 3-16 Area/Phase-Specific Procedures for Certifying FRL Attainment:  |
|  | FINAL Certification Design Letter for Area 1, Phase II, October 1999  | Sludge Drying Beds (41): Section 4.1, Certification Design, pp. 4-1 to 4-5; Section 4.3, Sampling, pp. 4-6 to 4-7  |
|  | FINAL Certification Design Letter for Area 6, Phase I, May 2003   | Fire Training Facility (1): Section 4.0, Certification Approach, pp. 4-1 to 4-3  |
|  | FINAL Certification Design Letter for Area 3A and Area 3B,<br>August 2004   | Plant 1 Pad (20):<br>Section 4.0, Certification Approach, pp. 4-1 to 4-6   |
|  | FINAL Certification Design Letter and Certification Project<br>Specific Plan for Area 4B – Part One (Revision 1), September<br>2005                             | Drum Storage Area Near Lab Loading Dock (4), Plant 8 West<br>Pad (18), Trane Incinerator (28), UNH Tanks – NFS Storage<br>Area (46), UNH Tanks – North of Plant 2 (47), UNH Tanks –<br>Digestion Area (49), UNH Tanks – Raffinate Building (50): |
|  |   | Section 3.0, Area-Specific Constituents of Concern, pp. 3-1 to 3-8; Section 4.0, Certification Approach, pp. 4-1 to 4-10   |
|  | FINAL Certification Design Letter and Certification Project<br>Specific Plan for Area 6 Waste Pits 4, 5, and 6, January 2006                                    | Waste Pit 4 (27), Waste Pit 5 (42):  |
|  |   | Section 3.0, Area-Specific Constituents of Concern, pp. 3-1 to 3-7; Section 4.0, Certification Approach, pp. 4-1 to 4-10   |
|  | FINAL Certification Design Letter and Certification Project<br>Specific Plan for Area 6 Former Production Area and Main<br>Drainage Corridor Area, January 2006 | Plant 8 East Drum Storage Pad (17), Storage Pad North of Plant 6 (36), Uranyl Nitrate Tanks – Southeast of Plant 2 (48):   |
|  |   | Section 3.0, Area-Specific Constituents of Concern, pp. 3-1 to 3-12; Section 4.0, Certification Approach, pp. 4-1 to 4-15  |
| Description of Removal Efforts and     Treatment Processes (Closure Guidance     Item 3.15)  | OU1 FINAL Remedial Design Documents Package, August 1998  | Removal and Handling of Waste Pit Waste – Waste Pit 4 (27),<br>Waste Pit 5 (42):<br>Volume 2, Excavation Plan  |
|  | OU1 FINAL Remedial Action Documents Package, April 1999   | Processing of Waste Pit Waste – Waste Pit 4 (27), Waste Pit 5 (42):  Operations and Maintenance (O & M) Plan for Remediation Facilities  |
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| Description of Removal Efforts and     Treatment Processes (Closure Guidance     Item 3.15) - Continued | OU3 Implementation Plans for Above-Grade Decontamination and Dismantlement                         | Removal and Treatment of Waste in HWMU:  To be Submitted for Each D&D Complex (where applicable)   |
| item 3.15) - Continued  | OU5 FINAL Feasibility Study Report, June 1995  | Evaluation of Technologies and Process Options:<br>Section 3.3, p. 3-5   |
|   | OU5 FINAL Sitewide Excavation Plan, July 1998  | Excavation, Loading, Staging, Storage, Treatment, and/or Disposition of Impacted Material: Section 2.0, Remediation Issues and General Strategies; Section 3.0, General Implementation Approach; Section 4.0, Location Specific Excavation Approaches; Appendix B, Sitewide Sequencing Plan; Appendix F, Implementation of Construction; Appendix I, Sitewide Extent of Contamination by Constituent |
|   | OU5 Integrated Remedial Design Packages (IRDPs) for Individual<br>Remediation Areas                | Area/Phase-Specific Excavation, Loading, Staging, Storage, Treatment, and/or Disposition of Impacted Material:   |
|   | Area 1, Phase II Supplemental Characterization Package, April 1999                                 | Sludge Drying Beds (41):  Management of Sludge: Section 3.3, Material Disposition Sampling Plan, p. 3-3; Management of Soil: Section 5.0, Excavation, pp. 5-1 to 5-4   |
|   | FINAL Implementation Plan for Area 3A/4A, May 2001   | Storage Pad North of Plant 6 (36): Section 3.2.2, Concrete, Asphalt Pads, Roadways and Floors, pp. 3-9 to 3-10; Section 3.3.3, HWMUs and USTs, p. 3-17; Section 3.3.4, General Excavation, pp. 3- 17 to 3-19   |
|   | FINAL Implementation Plan for Area 6 - Solid Waste Landfill and Fire Training Facility, March 2003 | Fire Training Facility (1):  Section 4.2, At- and Below-Grade Structure Demolition, pp. 4-5 to 4-6; Section 4.3, Soil Excavation, Monitoring and Segregation, pp. 4-6 to 4-10; Section 4.4, Impacted Material Management, pp. 4-10 to 4-12   |
|   | FINAL Implementation Plan for Area 3B/4B/5, February 2004  | Drum Storage Area Near Lab Loading Dock (4), Drum Storage Area South of W-26 (5), Tank Farm Sump (11), Plant 8 East Pad (17), Plant 8 West Pad (18), Plant 1 Storage Pad (20), Abandoned Sump West of Pilot Plant (22): Section 3.6.2, HWMUs and USTs, pp. 3-22 to 3-24; Section 3.7, Impacted Material Management, pp. 3-28 to 3-29   |
|   | FINAL Excavation Plan for Area 6 Waste Pits and General<br>Area, October 2005                      | Waste Pit 4 (27), Waste Pit 5 (42): Section 3.4, Remedial Excavation, pp. 3-5 to 3-9   |
|   | OU1 FINAL Record of Decision, January 1995   | ARARs: Relevant and Appropriate as some remedial alternatives may require closure to these standards Tables B-28 and B-29  |

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| Description of Removal Efforts and  | OU1 FINAL Remedial Design Work Plan, June 1995   | Revised ARARs: Tables A-24 and A-25   |
| Treatment Processes (Closure Guidance Item 3.15) – Continued                                    | THAL Hellicular Design Work Hall, Julie 1999   | Hevised Atlants. Tables A-24 and A-25   |
| 10. Landfill Closure Requirements – (if applicable) <sup>3</sup> - (Closure Guidance Item 3.16) | OU5 FINAL Record of Decision, January 1996   | Not Applicable, if Remediation Levels for Soil and Groundwater are Sufficient for a Clean Hazardous Waste Management Unit Closure <sup>1</sup> : ARARs: Table B-3, p. B.3-10  |
|   | OU5 Integrated Remedial Design Packages for Individual<br>Remediation Areas                        | Area/Phase-Specific Landfill Closure Requirements:  |
|   | Area 1, Phase II Integrated Remedial Design Package,<br>September 1998                             | Sludge Drying Beds (41): Included within Appendix A, Design Criteria Package, Table A-2, p. A-32, but not anticipated to be applicable since HWMU to be clean (risk-based) closed by removal.   |
|   | FINAL Implementation Plan for Area 3A/4A, May 2001   | Storage Pad North of Plant 6 (36):<br>Included within Appendix A, Design Criteria Package, Table<br>A-2, pp. A-69 to A-74, but not anticipated to be applicable<br>since HWMU to be clean (risk-based) closed by removal.   |
|   | FINAL Implementation Plan for Area 6 - Solid Waste Landfill and Fire Training Facility, March 2003 | Fire Training Facility (1): Included within Appendix A, Design Criteria Package, Table A-2, pp. A-69 to A-74, But not anticipated to be applicable since HWMU to be clean (risk-based) closed by Removal  |
|   | FINAL Implementation Plan for Area 3B/4B/5, February 2004  | Drum Storage Area Near Lab Loading Dock (4), Drum Storage Area South of W-26 (5), Tank Farm Sump (11), Plant 8 East Pad (17), Plant 8 West Pad (18), Plant 1 Storage Pad (20), Abandoned Sump West of Pilot Plant (22): Included within Appendix A, Design Criteria Package, Table A-2, pp. A-69 to A-74, But not anticipated to be applicable since HWMUs are to be clean (risk-based) closed by Removal |
| 11. Certification (Closure Guidance Item 3.18)  | OU1 Remedial Action Report   | Summary of HWMU Remediation Activities/Certification Sampling Results:  To be Submitted   |
|   | OU1 FINAL Operable Unit 1 Complex Project Completion Report,<br>October 2005                       | Summary of D&D Activities Completed for Buildings and Equipment Used to Support OU1 Remedial Action (OU1 includes Waste Pits 4 (27) and 5 (42))   |
|   | OU3 Project Completion Reports   | Summary of HWMU Remediation Activities:  To be Submitted for Each D&D Complex   |
|   | FINAL Plant 1 Complex - Phase 1 Project Completion Report,<br>December 1997                        | Plant 1 Storage Bldg Bldg. 67 (25):<br>Section 2.1.3, pp. 7 to 8  |

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| 11. Certification (Closure Guidance Item 3.18) - Continued | FINAL Thorium/Plant 9 Complex Project Completion Report,<br>April 1999   | Plant 9 Warehouse - Bldg. 81 (35):<br>Section 2.2.11, pp. 12 to 14   |
|  | FINAL Project Completion Report for the Decontamination of HWMU No. 50 – UNH Tanks, Hot Raffinate Building and HWMU No. 28 – Trane Incinerator, May 1999 | Trane Incinerator (28); UNH Tanks - Raffinate Building (50)  |
|  | FINAL Miscellaneous Small Structures Decontamination and Dismantlement Project, Task Order #432 Completion Report, October 1999                          | Waste Oil Decant Shelter (component of Trane Incinerator) (28): Section 2.3, pp. 3 to 5  KC-2 Warehouse – Bldg. 63 (34)  |
|  |  | Section 2.4, pp. 5 to 6  |
|  | FINAL Miscellaneous Small Structures Decontamination and Dismantlement Project, Task Order #464 Completion Report, December 2000                         | UNH Tanks - NFS Storage Area (46): Section 2.0, p. 1, Component-Specific Remediation Summary; Section 2.5, HWMU No. 46 Decontamination, p. 4   |
|  | FINAL Plant 1 Complex – Phase II Project Completion Report,<br>November 2003   | CP Warehouse - Building 56 (19):<br>Section 2.2.4, pp. 5 to 6  |
|  |  | Plant 1 Pad Components (20):  TS-4: Section 2.2.6, pp. 6 to 7  TS-5: Section 2.2.7, p. 7  TS-6: Section 2.2.8, pp. 7 to 8  |
|  |  | Section 3.0, Material Management, pp. 8 to 9   |
|  | FINAL Laboratory Complex Project Completion Report, July 2004  | Pilot Plant Warehouse (33):<br>Section 2.2.4, pp. 6 to 7   |
|  | FINAL Multi-Complex Project Completion Report, July 2004   | NAR System (10), Box Furnace (14), Oxidation Furnace #1 (15), Plant 8 Warehouse - Bldg. 80 (29), UNH Tanks - North of Plant 2 (47), UNH Tanks - Southeast of Plant 2 (48), UNH Tanks - Digestion Area (49):  Section 3.0, HWMU Closure Tasks, pp. 24 to 35 |
|  | FINAL Pilot Plant Complex Project Completion Report,<br>September 2004   | Tank T-2 (54):<br>Section 3.0, HWMU Closure Tasks, p. 9  |
|  | FINAL East Warehouse Complex Project Completion Report,<br>July 2005   | Plant 6 Warehouse (37): Section 3.0, HWMU Closure Tasks, pp. 5 to 6  |
|  | OU3 Remedial Action Report   | Certification of Conformance with Requirements and Standards:<br>To be Submitted   |
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| Certification (Closure Guidance Item 3.18) -     Continued | OU5 Certification Reports for Individual Remediation Areas:  | Area/Phase-Specific Certification Reports (Summary of Remedial Activities/Certification Sampling Results):  |
|  | FINAL Certification Report for Area 1, Phase II, October 2000  | Sludge Drying Beds (41): Section 2.1.5,3, Sector 3 Certification Units, pp. 2-9 to 2- 11; Section 2.3, Statistical Analysis, pp. 2-12 to 2-13; Section 3.1, Excavation Activities, p. 3-1; Section 3.2, Changes to Scope of Work, pp. 3-3 to 3-5; Section 5.2, Sludge Drying Bed HWMU Closure, p. 5-3   |
|  | FINAL Certification Report for Area 6, Phase I – Part 2, March 2004                                      | Fire Training Facility (1): Section 2.2, Certification Approach; Section 3.0, Overview of Field Activities; Section 4.0, Analytical Methodologies, Data Validation Processes and Data Reduction; Section 5.0, Certification Evaluation and Conclusions  |
|  | FINAL Certification Report for Area 3A and Area 3B, February 2005  | Plant 1 Pad (20): Section 2.0, Certification Approach, pp. 2-1 to 2-14; Section 3.1.2, Overview of Field Activities – Area 3B, pp. 3-3 to3-4; Section 4.0, Analytical Methodologies, Data Validation Processes and Data Reduction, pp. 4-1 to 4-6; Section 5.1.2, Certification Results and Evaluation – A3B-HWMU 20, pp. 5-9 to 5-10; Section 5.2, Areas 3A and 3B Certification Conclusions, p. 5-10  |
|  | FINAL Certification Report for Area 4B – Part One, January 2006  | Drum Storage Area Near Lab Loading Dock (4), Plant 8 West Pad (18), Trane Incinerator (28), UNH Tanks – NFS Storage Area (46), UNH Tanks – North of Plant 2 (47), UNH Tanks – Digestion Area (49), UNH Tanks – Raffinate Building (50):  Section 2.0, Certification Approach; Section 3.0, Overview of Field Activities; Section 4.0, Analytical Methodologies, Data Validation Processes and Data Reduction; Section 5.0, Certification Evaluation and Conclusions |
|  | FINAL Certification Report for Area 6 Waste Pits 4, 5, and 6, April 2006                                 | Waste Pit 4 (27), Waste Pit 5 (42): Section 2.0, Certification Approach; Section 3.0, Overview of Field Activities; Section 4.0, Analytical Methodologies, Data Validation Processes and Data Reduction; Section 5.0, Certification Evaluation and Conclusions  |
|  | Draft Certification Report for Area 6 Former Production Area and Main Drainage Corridor Area, March 2006 | Tank Farm Sump (11), Storage Pad North of Plant 6 (36), UNH Tanks (48):  Section 2.0, Certification Approach; Section 3.0, Overview of Field Activities; Section 4.0, Analytical Methodologies, Data Validation Processes and Data Reduction; Section 5.0, Certification Evaluation and Conclusions   |
|  | OU5 Interim Remedial Action Report   | Certification of Conformance with Requirements and Standards:  To be Submitted  |

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| 12. Status of Facility (or Unit) After Closure (Closure | OU1 FINAL Record of Decision, January 1995                             | Status of Waste Pits After OU1 Remedial Action:                                  |
| Guidance Item 3.19)                                     |  | pp. 10-1 to 10-9   |
|   | OU3 FINAL Record of Decision for Interim Remedial Action, June 1994    | Status of Production Area HWMUs After OU3 Remedial Action:<br>Section 5.4, p. 11 |
|   | OU3 Final Record of Decision for Final Remedial Action, September 1996 | Integration of the Interim and Final Remedial Actions, Section 2.1, p. 9         |
|   | OU5 FINAL Record of Decision, January 1996                             | Status of FCP After Soil and Groundwater Remediation:<br>Section 4.0, p. 4-1     |
|   | OU5 FINAL Sitewide Excavation Plan, July 1998                          | Certification Reports: Section 7.4, pp. 7-10 to 7-14                             |
|   | OU5 Certification Reports for Individual Remediation Areas             | Status of those HWMUs That Had Soil Contamination After Soil Remedial Action:    |
|   |  | To be Submitted (if required)  |

<sup>&</sup>lt;sup>1</sup> Closure Guidance Items are from the Closure Plan Review Guidance for RCRA Facilities, Ohio EPA, March 1999.

<sup>&</sup>lt;sup>2</sup> The perched water contamination has many sources, only some of which are the HWMUs. Because of this, it is difficult or impossible to identify the degree to which a HWMU may have contributed to perched water contamination. Therefore, the nature and extent of contamination in the perched water, and the most appropriate remedial action method and objectives, are best achieved under the CERCLA process alone.

Ohio EPA has two options for clean closure where there are no more RCRA requirements (i.e., no post-closure requirements) for the existing HWMUs: (1) complete removal of waste and impacted environmental media, and (2) complete removal of waste and impacted environmental media to health-based standards (known at the FCP as Final Remediation Levels, FRLs). Post closure requirements will, however, be applicable to the CERCLA on-property disposal cell as it will take some soil and debris contaminated with RCRA-hazardous waste [see Post Closure Care and Inspection Plan, On-Site Disposal Facility (20100-PL-010, Rev. 1, July 1997)].